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Attorney for Plaintiff,
ROBERT MILLER

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK**

ROBERT MILLER,

Plaintiff,

v.

HAREDIM CONSULTING, INC.; and
DOES 1-10, inclusive

Defendants.

Case No. 1:19-cv-01474(GTS/DJS)

**DECLARATION OF RAYMINH L.
NGO IN SUPPORT OF
PLAINTIFF'S REQUEST FOR
ENTRY OF DEFAULT**

DECLARATION OF RAYMINH L. NGO

I, Rayminh L. Ngo, declare as follows:

1. I am an attorney at law, duly admitted to practice before the Courts of the State of New York and the United States District Court for the Northern District of New York. I am the attorney for Plaintiff in the above captioned action.

2. I make this Declaration in support of Plaintiff's request that the Clerk enter default against Defendant Haredim Consulting, Inc. I have personal knowledge of the following facts, and, if called as a witness, I could and would testify as follows:

3. I am informed and believe that on December 18, 2019, Defendant was served with Summons and Complaint pursuant to Rule 4 of the Federal Rules of Civil Procedure. *See* ECF Docket #6.

4. I am informed and believe that the Proof of Service on Defendant was previously filed with the Court also on January 14, 2020. *See* ECF Docket #6.

5. I am informed and believe that Defendant has not responded or appeared to the Court in any matter.

6. I am informed and believe the Defendant is not an infant or incompetent person.

7. I am informed and believe the Service members Civil Relief Act (50 U.S.C. App. § 521) does not apply.

8. I am informed and believe that no answer has been filed with the Court. Therefore, Plaintiff requests entry of default against the Defendant Haredim Consulting, Inc..

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I declare under penalty of perjury that the foregoing is true and correct under the laws of the United States of America.

Executed this January 15, 2020, at Salt Lake City, UT.

/s/ **Rayminh L. Ngo**
Rayminh L. Ngo, Esq.
Counsel for Plaintiff

CERTIFICATE OF SERVICE

I, the undersigned, say:

I am a citizen of the United States and I am a member of the Bar of this Court. I am over the age of 18 and not a party to the within action.

My business address is 1504 Brookhollow Dr., Ste. 112, Santa Ana, California, 92705.

X On the date of execution of this declaration, I caused to be served the foregoing **Request for Certificate of Default; Affirmation of Rayminh L. Ngo In Support of Request for Certificate of Default; and [Proposed] Certificate of Default** on all parties in this action by placing a true copy thereof enclosed in a sealed envelope as follows:

HAREDIM CONSULTING, INC.
ATTN: ALLSTATE CORPORATE SERVICES CORP.
registered agent
99 Washington Avenue, Suite 1008.
ALBANY, NEW YORK, 12260

BY CM/ECF NOTICE OF ELECTRONIC FILING: I electronically filed the document(s) with the Clerk of the Court by via the *CM/ECF* system. Participants in this case who are not registered with the *CM/ECF* system will be served by first-class mail or by other means permitted by the Court.

I certify under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on January 15, 2020, at Salt Lake City, Utah.

/s/ Rayminh L. Ngo
Rayminh L. Ngo, Esq.
Counsel for Plaintiff